PARONICH LAW, P.C.

350 Lincoln Street, Suite 2400 Hingham, MA 02043

Anthony I. Paronich

Tel. (508) 221-1510 Fax (508) 318-8100 anthony@paronichlaw.com

VIA ECF

The Honorable Joseph A. Marutollo United States Magistrate Judge United States District Court, Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: *Hoffman v. BizFund LLC*, No. 1:25-cv-02186-AMD-JAM — Request to Continue Rule 16 Conference and for Telephonic Appearance

Dear Judge Marutollo:

The parties respectfully move for the Rule 16 initial conference to proceed by telephone on Thursday, October 16, 2025 or, in the alternative, Wednesday, October 22, 2025, at the Court's convenience. Plaintiff has a court-ordered mediation in another matter on October 8, 2025 and Defendant's counsel cannot attend because that day is a religious holiday.

A brief telephonic conference on one of the proposed dates will allow counsel to report on mediation outcomes and address any scheduling matters efficiently. If the Court prefers to hold the conference in person, the parties can accommodate a later in-person date at the Court's convenience.

Pursuant to the Court's rules regarding adjournments and extensions, this motion states the original date of October 8, 2025 and the reason for the request above as well as the fact that the Plaintiff did previously request an extension prior to when counsel for the Defendant filed an appearance. No other dates will be affected and the parties have conducted their Rule 26(f) conference, submitted the Proposed Scheduling Order and commenced discovery.

Thank you for the Court's consideration.

Respectfully submitted,

/s/ Anthony I. Paronich
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(o) 617-485-0018 | (c) 508-221-1510
anthony@paronichlaw.com

cc: Counsel of Record (via ECF)